

NORTH PENN AREA 5
ADMINISTRATIVE RECORD FILE
FOR THE ADMINISTRATIVE ORDER ON CONSENT AND *
SETTLEMENT AGREEMENT (AOC)
FOR OU 2 REMOVAL ACTION
INDEX OF DOCUMENTS

1. Baron Blakeslee, Inc.'s Driver's Statement, re: **
TCE Spill at Gas Spring Company, dated 1/29/80.
2. Memorandum re: Gas Spring Corp., County Line Road - H. **
Borchers and Robert Buller witnessing of the TCE Spill by
Baron Blakeslee, Inc., on January 29, 1980, (undated).
3. Memorandum to P. Dizikes, from P. J. Riely, re: **
Meeting with Harry Borchers, Ground Water Recovery Plan,
likely dated 12/80.
4. Baron Blakeslee, Inc.'s Summary of Bulk Delivery of **
Trichloroethylene (TCE) to Gas Spring Company, Invoice
dates from 1/30/80 - 5/20/81. Two forms are attached.
5. Gas Spring Corporation's Cancelled Checks, Credit Memos, **
Invoices, and Receipts for Deliveries/Pickups of TCE by
Baron Blakeslee, Inc., 1980-1984.
6. PADER Hazardous Waste Manifests for Gas Spring Company, **
dated 12/80 - 11/85. An Index Form is attached.
7. Gas Spring Company order to Mr. Baron Blakeslee, Allied **
Chemical, for 2 drums of TCE, date received 2/26/86.

* Administrative Record File available 3/20/14.

** Marked documents can be found in the North Penn Area 5
Administrative Record File for the Unilateral
Administrative Order (UAO) for OU 2 Remedial
Design/Remedial Action (RD/RA) and are incorporated herein
by reference.

8. Letter to Ms. Lorie Acker, U.S. EPA, from Mr. Robert Block, Baron Blakeslee, Inc., re: Baron Blakeslee, Inc.'s CERCLA Section 104(e) Response, 7/11/86. **
9. Letter to Ms. Lori Acker, U.S. EPA, from Mr. Kevin Flanagan, Gas Spring Company, re: North Penn Water Authority Municipal Well Contamination, Gas Spring Company's CERCLA Section 104(e) Response, 8/5/86. **
10. Commonwealth of Pennsylvania Memorandum of Lease, between County Line Land Corp., Lessor, and Gas Spring Company, a Division of Fichtel & Sachs Industries, Inc., Tenant, 12/22/88. **
11. Assignment of Installment Sale Agreement, between County Line Land Corporation (CLL Corp) and County Line Land Limited Partnership (CLLLP), for the former Stabilus property, 12/29/88. **
12. Excerpt from the Federal Register, Vol. 54, No. 61, Title 40, Part 300, 40 C.F.R. 300, National Priorities List for Uncontrolled Hazardous Waste Sites - Final Update #5, Final Rule, Final listing of North Penn - Area 5 on the National Priorities List (NPL), 3/31/89. **
13. Letter to Ms. Sarah Keating, U.S. EPA, from Mr. Deane Bartlett, Manko, Gold & Katcher, re: Response to EPA's General Notice Letter for the Site on behalf of County Line Land Corp (CLL Corp), 12/3/90. **
14. Deed and related documents showing transfer of 92 County Line Road, Montgomery Township, Montgomery County, Pennsylvania, (former Stabilus facility) from County Line Land Limited Partnership to H&N Packaging, Inc., dated from 4/30/99. **
15. Report: Draft Remedial Investigation Report, Revision I, Remedial Investigation and Feasibility Study, Volume 1 of 3, North Penn Area 5 Site, Colmar, Montgomery ***

*** Marked documents can be found in the North Penn Area 5 Administrative Record File and are incorporated herein by reference.

County, Montgomery County, Pennsylvania, prepared by Tetra Tech/Black & Veatch, 7/02.

16. Report: Draft Remedial Investigation Report, Revision I, Remedial Investigation and Feasibility Study, Volume 2 of 3, Appendices, North Penn Area 5 Site, Colmar, Montgomery County, Montgomery County, Pennsylvania, prepared by Tetra Tech/Black & Veatch, 7/02. ***
17. Report: Draft Remedial Investigation Report, Revision I, Remedial Investigation and Feasibility Study, Volume 3 of 3, Supplemental RI, North Penn Area 5 Site, Colmar, Montgomery County, Montgomery County, Pennsylvania, prepared by Tetra Tech/Black & Veatch, 7/02. ***
18. Report: Draft Feasibility Study Report, Revision 1, North Penn Area 5 Site, Colmar, Montgomery County, Pennsylvania, prepared by Tetra Tech/Black & Veatch, 7/02. ***
19. Office of Solid Waste and Emergency Response (OSWER) *Draft Guidance for Evaluating the Vapor Intrusion to Indoor Air Pathway from Groundwater and Soils (Subsurface Vapor Intrusion Guidance)*, U.S. EPA, EPA530-D-02-004, 11/02. P. 100001-100178.
20. Reports: 1999, 2001 & 2002 H&N Packaging, Inc., Residual Waste Reports, Colmar/Lafayette Hill, Pennsylvania, prepared by Compliance Management International for PADER, dated 2/00 - 2/03. Transmittal letters are attached. **
21. Letter to Ms. Natalie Katz, U.S. EPA, from Mr. M. Joel Bolstein, Fox Rothschild LLP, re: Request for extension of time to respond to CERCLA Section 104(e) Request for Information letter dated May 1, 2003, 6/24/03. **
22. Letter to Mr. Harry Steinmetz, U.S. EPA, from Mr. M. Joel Bolstein, Fox Rothschild LLP, re: Stabilus, Inc.'s CERCLA Section 104(e) Response, 7/10/03. **
23. Report: Remedial Investigation Report Supplement II, North Penn Area 5, Colmar, Pennsylvania, prepared by Tetra Tech/Black & Veatch, 9/03. ***

24. Letter to Mr. Harry Steinmetz, U.S. EPA, from Mr. M. Joel Bolstein, Fox Rothschild LLP, re: Stabilus, Inc.'s CERCLA Section 104(e) Response, 10/17/03. An envelope is attached. **
25. Letter to Ms. Natalie Katz, U.S. EPA, from Mr. M. Joel Bolstein, Fox Rothschild LLP, re: Follow-up to 10/14/03 104(e) request, 10/21/03. Related documents are attachments. **
26. Packet of corporate history documents for Stabilus, Inc., dated from 10/25/01 - 10/23/03. **
27. Letter to Mr. Harry Steinmetz, U.S. EPA, from Mr. David Nunn, Eastman & Smith LTD, re: ZF Sachs Automotive of America, Inc.'s (ZF Sachs) CERCLA Section 104(e) Response, 11/21/03. **
28. Letter to Ms. Natalie Katz and Ms. Allison Gardner, U.S. EPA, from M. Joel Bolstein, Fox Rothschild LLP, re: North Penn Area 5 Superfund Site, Significant New Information Regarding History of AEL's Operations, 1/30/04. Related documents are attached. **
29. Letter to Ms. Joanne Marinelli, U.S. EPA, from Mr. Todd Gelb, BAE Systems, Inc., re: EPA Letter of March 10, 2004, to Leon Riebman, 4/2/04. Related documents are attached. **
30. Letter to Ms. Joanne Marinelli, U.S. EPA, from Mr. M. Joel Bolstein, Fox Rothschild LLP, re: Stabilus, Inc.'s CERCLA Section 104(e) Response, 4/27/04. An envelope is attached. **
31. Letter to Ms. Joanne Marinelli, U.S. EPA, from Mr. Todd Gelb, BAE Systems, re: EPA Letter of June 1, 2004, to Leon Riebman, 7/6/04. Related documents are attached. **
32. Letter to Mr. Harry Steinmetz, U.S. EPA, from Mr. M. Joel Bolstein, Fox Rothschild LLP, re: Stabilus, Inc., North Penn Area 5 Site, Supplement to Response to Section 104(e) Letter, 2/22/05. **

33. Annual Report 2009, Constantia Packaging AG, 12/09. **
34. Online news release entitled, "Ashurst Advises Triton on Acquisition of Car Parts Manufacturer Stabilus," Ashurst.com website, 4/15/10. A June 24, 2011, Stabilus.com webpage entitled "Market and Figures," is attached. **
35. Online news releases regarding European ownership of Constantia Colmar, from the Constantia-Packaging.com website and the OneEquity.com website, 6/10/10 - 6/18/10. **
36. Annual Report 2010, ZF Sachs, 12/10. **
37. Pennsylvania Department of State Business Entity Filing History (Corporation Record) for Constantia Colmar, Inc., dated 6/24/11. **
38. *Toxicological Review of Trichloroethylene (CAS No. 79-01-6), In Support of Summary Information on the Integrated Risk Information System (IRIS)*, U.S. EPA, EPA635-R-09-011F, 9/11. P. 100179-101378.
39. Record of Decision for Interim Response Action, Operable Unit 2, North Penn Area 5 Superfund Site, 9/7/11. ++
40. Administrative Order for Remedial Design and Remedial Action, In the Matter of: North Penn Area 5 Superfund Site, Colmar and Hatfield Township, Pennsylvania, Docket No. CERCLA-03-2012-0205DC, 6/26/12. **
41. Table, OSWER Vapor Intrusion Assessment, Groundwater Concentration to Indoor Air Concentration (GWC-IAC) Calculator Version 2.0, May 2012 RSLs, 12/13. P. 101379-101383.
42. Table, OSWER Vapor Intrusion Assessment, Sub-Slab or Exterior Soil Gas Concentration to Indoor Air Concentration (SGC-IAC) Calculator Version 2.0, May 2012 RSLs, 12/13. P. 101384-101388.

++ Marked documents can be found in the North Penn Area 5 OU2 Administrative Record File and are incorporated herein by reference.

43. Electronic memorandum Ms. Allison Gardner, Ms. Sharon Fang, and Ms. Suzanne Parent, U.S. EPA, from Ms. Dawn Ioven, U.S. EPA, re: Draft North Penn 5 Vapor Intrusion Assessment Removal Order and the calculated subslab screening level for TCE, 12/18/13. P. 101389-101390. αα
44. Report: Intermediate (60%) Design Submittal, Pre-Design Investigation Report & Preliminary Remedial Design, Operable Unit 2, North Penn Area 5 Superfund Site, Unilateral Administrative Order (UAO), Docket No. CERCLA-03-2012-0205DC, prepared by Geosyntec Consultants, Inc., 2/17/14. P. 101391-101672. ##
45. *Review of the Draft 2002 Subsurface Vapor Intrusion Guidance*, OSWER, U.S. EPA, undated. P. 101673-101679.
46. Letter to Mr. Cosmo Servidio, Pennsylvania Department of Environmental Protection (PADEP), from Ms. Kathryn Hodgkiss, U.S. EPA, re: Transmittal of fully executed Administrative Order on Consent and Settlement Agreement for Removal Action in connection with Operable Unit 2, 3/13/14. P. 101680-101680.
47. Administrative Settlement and Order on Consent for Removal Response Action, in the Matter of: North Penn Area 5 Superfund Site, Docket No. CERC-03-2014-0060AC, 3/13/14. P. 101681-101711.

αα This document has been redacted due to confidential and privileged information. Redactions are evident on the face of the document.

Appendix C - Volatile Organic Compounds and General Chemistry Laboratory Analytical Reports, Lancaster Laboratories, Inc., of the *Intermediate (60%) Design Submittal, Pre-Design Investigation Report & Preliminary Remedial Design, Operable Unit 2*, was submitted separately, is voluminous, and is summarized elsewhere in the report; it is available upon request.

Confidential Documents ΔΔ

1. Ward's Business Directory of U.S. Private and Public Companies, Volume 3: Alphabetic Listing, P-Z, Stabilus - Sales information on Fichtel & Sach's Stabilus Division, 1/99. **

2. Electronic memorandum Ms. Allison Gardner, Ms. Sharon Fang, and Ms. Suzanne Parent, U.S. EPA, from Ms. Dawn Ioven, U.S. EPA, re: Draft North Penn 5 Vapor Intrusion Assessment Removal Order and the calculated subslab screening level for TCE, 12/18/13. P. 000001-000032. An undated, draft Administrative Settlement and Order on Consent for Removal Response Action, in the Matter of: North Penn Area 5 Superfund Site, Docket No. CERC-03-2014-XXXXDC, is attached.

ΔΔ Confidential documents are unredacted documents available for review at the U.S. EPA Region III office only with court ordered access in order to protect against the disclosure of privileged and confidential information.